

December 12, 2018

The Honorable Ajit Pai, Chairman
The Honorable Michael O’Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

RE: MB Docket No 05-311 In the Matter of Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992

I am writing in support of the Comments of the Cable Act Preservation Alliance (“CAPA”) in the Second Further Notice of Proposed Rule Making. I oppose the tentative conclusions the FCC reaches in the proceeding because of their impacts on our community.

For many years I have volunteer-coached the swim team at Simon Kenton High School in Independence, Kentucky and we partner on a regular basis with our local PEG Community Access Television facility, TBNK (*Telecommunications Board of NKY*), to produce coverage of our swim meets for local cable television. This coverage not only helps to give our high school swimmers the attention they deserve but it helps with recruiting for future years and the all-important quest for scholarships so they can pursue their college degrees and their athletic dreams, all at the same time. The coverage produced through our local Community Access TV center has been used in both scholarship applications as well as national entry videos for All-American status for our swimmers. Without a properly funded and properly supported Community Access TV facility, none of this would have been possible.

In addition to my involvement in local high school swim activities, I am a long standing member of the Independence City Council. This same PEG TV facility, TBNK, covers not only our City Council meetings, but also special city activities such as holiday parades and 4th of July festivals. This coverage allows the home-bound residents in our community who cannot attend to still enjoy these events and feel a part of our community. TBNK and PEG ACCESS is the conduit that makes this happen.

By allowing cable operators to reduce franchise fee support for local communities if they decide to keep local PEG channels (which have been understood for decades, under cable law, to be a negotiated obligation of franchise agreements, separate of franchise fees,) the FNPRM diminishes the ability of PEG channels to serve communities such as ours, and very likely eliminates the PEG channels in most communities due to the resultant loss of fees that most cities will not be able to afford. I ask that the FNRPM not be adopted. Thank you.

Sincerely,

Carol Franzen, Independence City Council and Swim Parent/Coach